

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

SIRAJ IBN WAHHAJ, et al.,

Defendants.

§
§
§
§
§
§
§
§

Cause No. 18 CR 2945 WJ

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Marc H. Robert, respectfully moves this Court for an extension of time to file a reply to the Government's response [Doc. 627] to Defendant's motion to dismiss Count 1 as multiplicitous [Doc.599], and in support thereof would respectfully show the Court as follows:

1. On February 3, 2023, Mr. Wahhaj filed a motion joined by all Defendants seeking dismissal of Count 1 of the superseding indictment as multiplicitous [Doc. 599]. The Government filed its response on February 16, 2023 [Doc. 627].

2. The undersigned counsel was out of town during the week of February 27, interfering with counsel's ability to prepare and file a reply to the Government's response. In addition, counsel was occupied in other matters during the time since the filing of the Government's response. Counsel requests a short extension of the time for the filing of a reply to the Government's response, to Monday, March 13, 2023.

3. The undersigned counsel has conferred with Assistant United States Attorneys Tavo Jackson Hall and Kimberly Brawley regarding this request. The Government has no objection to the requested extension.

WHEREFORE, SIRAJ IBN WAHHAJ , Defendant, respectfully requests this Court enter an Order extending the due date for Defendants' reply to the Government's response to Defendants' joint motion to dismiss Count 1 as multiplicitous [Doc. 599] to Monday, March 13, 2023, and providing for such other and further relief to which the Court may find the parties to be justly entitled.

Respectfully Submitted,

/s/ *Electronically filed on 3/9/23*

MARC H. ROBERT

P.O. Box 25271

Albuquerque, New Mexico 87102

575.571.7435

m505robert@gmail.com

THOMAS CLARK

432 Galisteo Street

Santa Fe, New Mexico 87501

505.820.1825

Fax: 505.986.0475

tmclark@cjplawsf.com

Counsel for Mr. Wahhaj